

July 7, 2021

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Via ECF

Honorable Andrew Carter
Southern District of New York
Thurgood Marshall Courthouse
40 Foley Square
New York, NY 10007

Re: *United States v. Larry Smith*, 18-cr – 420

Dear Judge Carter:

I represent Larry Smith in the above captioned matter. As you may recall, Mr. Smith was released on bond in April 2020 due to the COVID-19 pandemic. We write now to request to modify the conditions of Mr. Smith's release.

At the time Mr. Smith was released in April 2020, one of the conditions of his bond was home incarceration. In January 2021, Your Honor modified the conditions of Mr. Smith's release to end home incarceration and requiring a curfew with hours to be set by pre-trial services. The purpose of this modification was to permit Mr. Smith to help care for his son and seek employment. Mr. Smith has now been offered a job by Amazon. The position is located in Staten Island and would require overnight hours at least four days per week. If Mr. Smith is to accept this position, he would need to start on July 11, 2021. Accordingly, we respectfully request that Mr. Smith's conditions of release be further modified to end the curfew and the location monitoring services so that Mr. Smith may accept this offer of employment.

I have been in communication with Mr. Smith's pre-trial services officer, Officer John Moscato, and he has no objection to this request. I have also spoken to AUSA Christopher Clore about this request and he has no objection to this application.

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For the foregoing reasons, we respectfully request that the Court modify the conditions of Mr. Smith's bond by terminating the curfew and location monitoring. If the Court should have any questions, please feel free to contact me.

Respectfully submitted,

/s/ Ellen M. Murphy

Ellen M. Murphy

The application is **GRANTED**.
So Ordered.

cc: AUSA Christopher Clore (via ECF)
Gregory Morvillo, Esq. (via ECF)
Officer John Moscato (*via email*)

 7/9/21